

EXHIBIT

A



STATE OF TENNESSEE
DEPARTMENT OF COMMERCE AND INSURANCE
500 JAMES ROBERTSON PARKWAY
NASHVILLE, TN 37243-1131

May 28, 2009

Hartford Life & Accident Ins Co
2908 Poston Avenue, % C S C
Nashville, TN 37203
NAIC # 70815

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
7008 3230 0002 4321 0649
Cashier # 3250

Re: Sharon Simmons V. Hartford Life & Accident Ins Co

Docket # 09C1663

To Whom It May Concern:

We are enclosing herewith a document that has been served on this department on your behalf in connection with the above-styled matter.

I hereby make oath that the attached Complaint was served on me on May 22, 2009 by Sharon Simmons pursuant to Tenn. Code Ann. § 56-2-504 or § 56-2-506. A copy of this document is being sent to the Circuit Court of Davidson County, TN.

Brenda C. Meade
Designated Agent
Service of Process

Enclosures

cc: Circuit Court Clerk
Davidson County
506 Metro Courthouse
Nashville, Tn 37201

Service of Process 615.532.5260

STATE OF TENNESSEE
DAVIDSON COUNTY
20TH JUDICIAL DISTRICT☐ First
☐ Alias
☐ PluriesSharon Simmons

Plaintiff

Vs.

Hartford Life and Accident
Insurance Company
PO Box 2999
Hartford CT 06104-1124

Defendant

CIVIL ACTION
DOCKET NO.09C1663

Method of Service:

- ☐
- Davidson County Sheriff
-
- ☐
- Out of County Sheriff
-
- ☐
- Secretary of State
-
- ☐
- Certified Mail
-
- ☐
- Personal Service
-
- ☒
- Commissioner of Insurance

To the above named Defendant:

You are summoned to appear and defend a civil action filed against you in the Circuit Court, 1 Public Square, Room 302, P.O. Box 196303, Nashville, TN 37219-6303, and your defense must be made within thirty (30) days from the date this summons is served upon you. You are further directed to file your defense with the Clerk of the Court and send a copy to the Plaintiff's attorney at the address listed below.

In case of your failure to defend this action by the above date, judgment by default will be rendered against you for the relief demanded in the complaint.

ISSUED:

5.15.09**RICHARD R. ROOKER**Circuit Court Clerk
Davidson County, Tennessee

By:


Deputy Clerk

ATTORNEY FOR PLAINTIFF

or

PLAINTIFF'S ADDRESS

Address

Robert F. Spann, Attorney
1312 Sixth Ave, North
Nashville, TN 37208

TO THE SHERIFF:

Please execute this summons and make your return hereon as provided by law.

RICHARD R. ROOKER

Circuit Court Clerk

Received this summons for service this _____ day of _____, 20____.

SHERIFF



If you have a disability and require assistance, please contact 862-5204.

RETURN ON PERSONAL SERVICE OF SUMMONS

I hereby certify and return that on the _____ day of _____, 20____, I:

☐ served this summons and complaint/petition on _____
_____ in the following manner:

☐ failed to serve this summons within 30 days after its issuance because _____

Sheriff/Process Server

RETURN ON SERVICE OF SUMMONS BY MAIL

I hereby certify and return, that on the _____ day of _____, 20____ I sent, postage prepaid by registered return receipt mail or certified return receipt mail, a certified copy of the summons and a copy of the compliant in Docket No. _____ to the defendant, _____. On the _____ day of _____, 20____, I received the return receipt for said registered or certified mail, which had been signed by _____ on the _____ day of _____, 20____. Said return receipt is attached to this original summons and both documents are being sent herewith to the Circuit Court Clerk for filing.

SWORN TO AND SUBSCRIBED BEFORE ME ON THIS

_____ DAY OF _____, 20____.

PLAINTIFF, PLAINTIFF'S ATTORNEY OR OTHER PERSON
AUTHORIZED BY STATUTE TO SERVE PROCESS

NOTARY PUBLIC or _____ DEPUTY CLERK

MY COMMISSION EXPIRES: _____

NOTICE

TO THE DEFENDANT(S):

Tennessee law provides a four thousand dollar (\$4,000.00) debtor's equity interest personal property exemption from execution or seizure to satisfy a judgment. If a judgment should be entered against you in this action and you wish to claim property as exempt, you must file a written list, under oath, of the items you wish to claim as exempt with the clerk of the court. The list may be filed at any time and may be changed by you thereafter as necessary; however, unless it is filed before the judgment becomes final, it will not be effective as to any execution or garnishment issued prior to the filing of the list. Certain items are automatically exempt by law and do not need to be listed; these include items of necessary wearing apparel (clothing) for yourself and your family and trunks or other receptacles necessary to contain such apparel, family portraits, the family Bible, and school books. Should any of these items be seized, you would have the right to recover them. If you do not understand your exemption right or how to exercise it, you may wish to seek the counsel of a lawyer.

ATTACH
RETURN
RECEIPT
HERE
(IF APPLICABLE)

STATE OF TENNESSEE
COUNTY OF DAVIDSON

I, Richard R. Rooker, Clerk of the Circuit Court in the State and County aforesaid, do hereby certify this to be a true and correct copy of the original summons issued in this case.

RICHARD R. ROOKER, CLERK

(To be completed only if
copy certification required.)

By: _____ D.C.

IN THE CIRCUIT COURT FOR DAVIDSON COUNTY, TENNESSEE

SHARON SIMMONS, Executrix of the
Estate of Sylvia Eris Petty, deceased
Plaintiff.

2009 MAY 15 PM 1:35
RICHARD B. ROBERTS, CLERK

No.

DC 09C1663

v.

Jury Demand

HARTFORD LIFE AND ACCIDENT
INSURANCE COMPANY,
Defendant

COMPLAINT

Comes now, Plaintiff, Sharon Simmons, and would respectfully show to the Court.

1. She is the daughter of Sylvia Eris Petty, deceased, and is also the Executrix of her mother's estate, Docket No. 08P-1037, Probate Court for Davidson County, Tennessee. Plaintiff is a resident of Nashville, Davidson County, Tennessee.

2. The Defendant, Hartford Life and Accident Insurance Company, is a corporation with offices in Hartford, Connecticut.

3. That Sylvia Eris Petty was the beneficiary under an Accidental Death and Dismemberment Insurance Policy, No. ADD-10900 issued by the Defendant, Hartford Life and Accident Insurance Company. Said policy afforded coverage in the amount of \$100,000.00 in the event of the accidental death of a beneficiary under the policy.

4. Plaintiff would respectfully show that her mother died on June 1, 2008, after accidentally falling at her home in Nashville, Tennessee on May 28, 2008.

5. Plaintiff will show to the Court from medical testimony presented at the trial of this cause, that the accidental fall sustained by Sylvia Eris Petty on May 28, either caused or substantially contributed to her death on June 1, 2008.

6. Plaintiff has filed a claim for benefits under the aforementioned policy, but no payments or satisfaction of said claim has been forthcoming.

WHEREFORE, Plaintiff sues the Defendant for the benefits payable under said accidental death policy in the amount of \$100,000.00, and demands a jury to try this cause.

Respectfully Submitted,



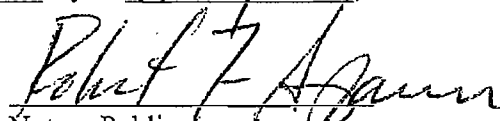
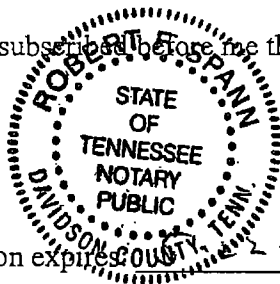
ROBERT F. SPANN, B.P.R. No. 2531
Attorney for Plaintiff
1312 6th Avenue, North
Nashville, TN 37208
(615) 248-2300

STATE OF TENNESSEE
COUNTY OF DAVIDSON

Sharon Simmons, first being duly sworn and in accordance with law, makes oath the information contained in the foregoing complaint, is true and correct to the best of her knowledge, information and belief.


SHARON SIMMONS

Sworn to and subscribed before me this 7 day of May, 2009.


Notary Public

My commission expires 12-10-10

I hereby certify that this is a true copy
of original instrument filed in my office
this 15 day of May, 2009
By Richard F. Roeker Clerk
Deputy Clerk

